

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

LDGP, LLC, d/b/a HARTSOUGH)	
DERMATOLOGY, an Illinois LLC, RITACCA)	
COSMETIC SURGERY AND MED SPA, Ltd., an)	
Illinois LLC, BLACK ALSATIANS, LLC d/b/a)	
PIGMENT DEMOGRAPHICS AND LASER)	
REMOVAL, a Texas LLC, SAXON and)	
SUSAN HATCHETT, BURKE DERMATOLOGY,)	Case No. 15-cv-50148
P.A. and ALL OTHERS SIMILARLY SITUATED,)	
)	
Plaintiffs,)	
)	
v.)	
)	
CYNOSURE, INC., a Delaware Corporation,)	
)	
Defendants.)	

DEFENDANTS' AGREED MOTION FOR ENTRY OF A CONFIDENTIALITY ORDER

NOW COMES Defendant, Cynosure, Inc., and pursuant to Federal Rule of Civil Procedure 26(c), move this Honorable Court for entry of a Confidentiality Order. In support, Defendant states as follows:

1. Defendant requests the entry of Form LR 26.2 Confidentiality Order ("Order") for the purposes of protecting production of certain documents and other information in this case. (Order, attached hereto as **Exhibit A**; Redline Order marking changes to Form LR 26.2, attached hereto as **Exhibit B**).

2. Defendant's counsel has consulted with counsel for Plaintiffs and the parties have reached an agreement as to entry of this particular Order.

3. Entry of this Order is just and reasonable to protect the parties from disclosure of protected or confidential information, such as financial, trade secret or other confidential research, development, or commercial information.

WHEREFORE, Defendant, Cynosure, Inc., respectfully requests that this Honorable Court enter the attached Agreed Confidentiality Order under Rule 26(c).

Date: March 18, 2016

Respectfully submitted,

By: /s/ Yesha Hoepfner
Counsel for Defendant

Eric L. Samore ARDC #6181345
Albert M. Bower ARDC # 6277162
Yesha Hoepfner ARDC #6304109
SmithAmundsen, LLC
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CERTIFICATE OF SERVICE

The undersigned certifies that on March 18, 2016, she served **Defendant's Agreed Motion for Entry of a Confidentiality Order** on all attorneys of record. This pleading was served upon the attorneys as listed above, pursuant to the Northern District of Illinois General Order on Electronic Case Filing.

[x] Pursuant to 28 USC Section 1746(2), I certify under penalty of perjury that the foregoing is true and correct. Executed on: March 18, 2016.

/s/ Yesha Hoepfner

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